

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
OEConnect, LLC)	WC Docket No. 09-197
)	
Petition for Eligible Telecommunications)	
Carrier Status to Receive CAF Phase II)	
Support Through the New NY Broadband)	
Program)	

**PETITION FOR ELIGIBLE
TELECOMMUNICATIONS CARRIER DESIGNATION**

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May 9, 2018

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**PETITION FOR ELIGIBLE
TELECOMMUNICATIONS CARRIER DESIGNATION**

Pursuant to § 214(e)(6) of the Communications Act of 1934 (“Act”), and § 54.202 of the Commission’s Rules (“Rules”), OEConnect, LLC (“OEConnect”) respectfully requests designation as an eligible telecommunications carrier (“ETC”) in the State of New York in all areas in which its parent company, Otsego Electric Cooperative (“OEC”), has been awarded Connect America Fund (“CAF”) Phase II support¹ via the New NY Broadband Program (“Broadband Program” or “Program”).²

OEC was recently awarded support to serve 1,406 locations in New York through New York’s auction for state and CAF support.³ As a result, OEConnect is obligated to obtain ETC

¹ See *Connect America Fund*, 32 FCC Rcd 968 (2017) (“*New York CAF Order*”).

² The \$500 million Broadband Program was established in 2015 to provide New York State grant funding to support projects that deliver high-speed Internet access to unserved and underserved areas of the State. Last year, the program received an influx of an additional \$170 million in funding from the FCC’s CAF budget. See Harper Neidig, “FCC Approves \$170M to Boost Broadband in NY,” THE HILL (Jan. 26, 2017), accessed at <http://thehill.com/policy/technology/316363-fcc-approves-170-million-for-rural-broadband-expansion-in-ny>.

³ See “Governor Cuomo Announces Round III of Nation-Leading New NY Broadband Program to Bring High-Speed Internet Access to All New Yorkers,” Press Release (Jan. 31, 2018) (“New York January 2018 Press Release”), accessed at <https://www.governor.ny.gov/news/governor-cuomo-announces-round-iii-nation-leading-new-ny-broadband-program-bring-high-speed>.

designation status within 180 days of this award in the CAF Phase II-eligible areas, *see* 47 C.F.R. § 54.315(b)(5), and requests expeditious action so that it may meet this requirement.

I. INTRODUCTION AND SUMMARY

OEConnect is a wholly-owned direct subsidiary of OEC, a non-profit electric distribution cooperative that has been providing electric services to the Central-Leatherstocking Region of New York since 1941. OEC has over 3,800 members located in areas served by over 750 miles of lines primarily in Otsego County and parts of southern Herkimer, southeastern Madison, and northeastern Chenango Counties. OEC is a green electric distribution cooperative with over 80 percent of its electricity coming from clean and renewable hydroelectric power from the Niagara River Project.

OEC formed OEConnect to construct and operate a new state-of-the-art fiber optic network to provide high-speed broadband Internet access and Voice over Internet Protocol (“VoIP”) services to cooperative members who currently lack access to such services. OEConnect will offer Internet service at download speeds of either 100 Mbps for \$49.95 per month, or 1 Gbps for \$79.95 per month, and will provide its customers with voice grade access to the Public Switched Telephone Network (“PSTN”) through its interconnected VoIP service.

In January 2018, OEC received a state grant of \$5,739,316 in Phase 3 of the Broadband Program. The state grant, which will be augmented by \$6,501,065 in private funding commitments and CAF Phase II support, will be used by OEConnect to deploy broadband service to 1,406 locations in the Mohawk Valley Region of New York.⁴ Attached hereto is a list of the CAF Phase

⁴ New York State Broadband Program Office, Broadband Program, Phase 3 Awardees, *accessed at* <https://nysbroadband.ny.gov/new-ny-broadband-program/phase-3-awards>.

II-eligible census blocks in New York that OEConnect will serve.⁵ In these CAF Phase II-eligible census blocks, OEConnect seeks ETC designation status from the Commission. OEC's Phase 3 grant award in the Broadband Program is in addition to a grant award OEC received last year in Phase 2 of the Program. OEC's Phase 2 award, totaling nearly \$5.1 million,⁶ covers 122 census blocks in OEConnect's service territory.

By installing a fiber optic network, OEConnect will be a facilities-based provider that focuses on specific rural and remote areas within or adjacent to OEC's electric service territory. As discussed in more detail below, the Commission has the authority to grant OEConnect ETC designation status pursuant to § 214(e)(6) of the Act, and OEConnect meets all of the statutory and regulatory requirements for ETC designation. Designating OEConnect as an ETC to receive CAF Phase II support, via the Broadband Program, as well as federal Lifeline support, will serve the public interest by allowing OEConnect to receive CAF Phase II high-cost support to construct a fiber optic network that will provide voice and broadband services to the underserved areas that OEC is obligated to serve pursuant to the terms of its Phase 3 New York award, as well as to provide subsidized voice and broadband services to qualified households in these Phase 3 areas.

II. THE COMMISSION HAS AUTHORITY TO GRANT THE ETC DESIGNATION REQUESTED BY OECONNECT

Pursuant to § 214(e)(6) of the Act, the Commission may designate an ETC where the applicant "is not subject to the jurisdiction of a State commission." 47 U.S.C. § 214(e)(6). On April 19, 2018, counsel to OEC and OEConnect was provided an affirmative statement from the

⁵ See Exhibit A (List of Census Blocks in Which OEConnect Seeks Eligible Telecommunications Carrier Designation Status).

⁶ The state grant amount is \$3,935,949 with a private match of \$1,145,065, for a total amount of \$5,081,014. Broadband Program Phase 2 Awards, *accessed at* <https://nysbroadband.ny.gov/new-ny-broadband-program/phase-2-awards>.

Office of Telecommunications of the State of New York Department of Public Service (“NY DPS”) that NY DPS does not exercise jurisdiction over broadband and VoIP providers seeking Competitive ETC designation.⁷ Given the requirement that OEConnect obtain ETC status within 180 days of award of support, OEConnect urges the Commission to “act swiftly” on this request for ETC designation. *New York CAF Order*, 32 FCC Rcd at 990 (¶ 59). OEConnect requests ETC designation status in all of the areas identified in Exhibit A in the State of New York where it has been awarded CAF Phase II support through the Broadband Program.

III. OECONNECT MEETS THE STATUTORY AND REGULATORY PREREQUISITES TO BE DESIGNATED AS AN ETC

As demonstrated herein, OEConnect satisfies each of the statutory and regulatory requirements set forth in the Act and the Rules.

A. OEConnect Will Provide Service as a Common Carrier

As to customers and locations where OEC is awarded support, OEConnect will provide its interconnected VoIP service on a common carrier basis. As such, OEConnect certifies that it is a common carrier under §§ 214(e)(1) and 214(e)(6) of the Act.⁸

B. OEConnect Will Offer the Services Supported by the Federal Universal Service Support Mechanisms

As described below, OEConnect certifies that it will provide the following services that are supported by federal universal service support mechanisms:⁹

1. Voice Grade Access to the PSTN – OEConnect will meet this requirement through its provision of IP-based voice communications service that is interconnected to the

⁷ See Exhibit B, Letter from Debra LaBelle, Director, Office of Telecommunications, New York Department of Public Service, to Todd B. Lantor, Lukas, LaFuria, Gutierrez & Sachs, LLP, April 19, 2018 (Affirmative Statement from the New York PSC Deferring Jurisdiction Over OEConnect’s ETC Petition to the Federal Communications Commission).

⁸ See Exhibit C (Affidavit of Timothy R. Johnson, Chief Executive Officer, OEConnect, LLC) (“Johnson Affidavit”).

⁹ See *id.*

PSTN. This service will include minutes of use for local service provided at no charge to end users (specifically, plans are generally unlimited usage within the U.S.) and access to emergency services via 911 or E-911, wherever available from local government or public safety organizations. OEConnect also commits to provide toll limitation services to qualifying low-income consumers as provided in §§ 54.400-54.423 of the FCC's Rules.

2. Broadband Internet Access Services – OEConnect's broadband Internet offering will provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service.

OEConnect further commits to provide these services consistent with the FCC's high-cost universal service support rules applicable to it. *See e.g.*, 47 C.F.R. § 54.101(c). In addition, OEConnect will offer Lifeline voice and broadband service to qualifying low-income consumers pursuant to the FCC's Lifeline rules at all locations where OEC has been awarded CAF Phase II support. *See id.* §§ 54.101(d), 54.400 *et seq.* Moreover, OEConnect will bid on category one telecommunications and Internet access services in response to a posted FCC Form 470 seeking broadband service that meets the connectivity targets for the FCC's E-rate program for eligible schools and libraries located within any area where it will receive CAF support. *See id.* § 54.309(b). Any such bid by OEConnect will be at rates that are reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings. *Id.*

C. OEConnect Will Provide Service Using Its Own Facilities

OEConnect will be a facilities-based broadband Internet access and VoIP services provider. It is in the process of constructing the first segment of its fiber optic network. It plans to partner with Momentum Telecom¹⁰ to offer interconnected VoIP service.

¹⁰ Momentum Telecom is a provider of voice, broadband management, and unified communications solutions. See Momentum Telecom website, accessed at <https://momentumtelecom.com/>.

D. OEConnect Will Provide Service Throughout Its Designated Service Area

OEConnect commits to providing the supported services throughout its ETC designated service area, consistent with all applicable requirements. OEConnect's requested ETC designated service area is solely limited to the areas identified in Exhibit A where OEC was awarded CAF Phase II support through the Broadband Program.

E. OEConnect Will Advertise the Availability of Its Services and Charges Using Media of General Distribution

OEConnect will advertise the availability of, and charges for, its supported service offerings using media of general distribution, and will undertake outreach initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements. OEConnect will offer and advertise its broadband and VoIP services, including those offerings that include all of the supported services, through a combination of media channels, such as television and radio, newspaper, magazines, and other print advertisements, outdoor advertising, direct marketing, and/or the Internet. OEConnect will use the appropriate media outlets to advertise its universal service offerings in a manner consistent with applicable requirements.

F. OEConnect Possesses the Financial and Technical Capability to Provide the Supported Services

In business since 1941, OEC has full financial capabilities to underwrite its share of construction and start-up expenses to get its fiber optic network built and to begin operations as OEConnect in the Internet and VoIP business. OEC will be able to obtain the requisite amount of short-term lending under its existing lines of credit and OEC is able to obtain additional financing, if necessary, in addition to the New York Phase 2 and Phase 3 awards and the CAF Phase II support being made available to OEC via the Broadband Program. Additional construction funding and

other financial information will be provided to the FCC by OEConnect as part of its FCC Form 5625 application.¹¹

At the end of 2017, OEC had total assets of over \$30 million and total debt of approximately \$15 million. OEC has never defaulted on any of its debts or obligations and it has consistently earned positive net margins.

G. OEConnect Will Meet the Additional Requirements for Designation as an ETC

OEConnect further certifies that it will meet all of the Commission's requirements for designation as an ETC under § 214(e)(6) of the Act.¹²

1. Compliance with Applicable Service Requirements. OEConnect certifies that it will comply with the service requirements applicable to the support that it receives, including the requirements for CAF Phase II support and the Broadband Program, and will provide additional information in this regard as part of its FCC Form 5625 application, including a certification from a professional engineer that the fiber optic network is capable of delivering, to at least 95 percent of the required number of locations, voice and broadband service that meets the requisite performance requirements and sufficient capacity to meet customer demand at or above the prescribed levels during peak usage periods. *See* 47 C.F.R. § 54.309.
2. Five-Year Plan. OEConnect certifies that it will provide service to the locations for which it has been awarded support consistent with the deployment obligations associated with such support.¹³
3. Ability to Remain Functional in Emergency Situations. OEConnect certifies that its fiber optic network will have the ability to remain functional in emergency situations, will have a reasonable amount of back-up power to ensure functionality without an external power source, will be able to reroute traffic around damaged facilities and will be capable of managing traffic spikes resulting from emergency situations. OEConnect's fiber optic network will support telephone service using Session Initiation Protocol-based VoIP technology and will support all phone features, including 911 services.

¹¹ FCC Form 5625, Connect America Phase II New York, Long Form Application — Main Form (Feb. 2018).

¹² *See* Exhibit C (Johnson Affidavit).

¹³ *See* 47 C.F.R. § 54.202(a)(1)(ii). The Commission has generally eliminated the five-year plan from its high-cost compliance requirements for programs with specific deployment obligations as conditions of support.

4. Consumer Protection and Service Quality Standards. OEConnect certifies that it will satisfy all applicable consumer protection and service quality standards, including those associated with the CAF Phase II program and New York State rules applicable to it as a recipient of support from the Broadband Program.

IV. ANTI-DRUG ABUSE CERTIFICATION

OEConnect certifies that no party to this petition is subject to denial of federal benefits, including Commission benefits, pursuant to § 5301 of the Anti-Drug Abuse Act of 1988.¹⁴

V. GRANT OF THIS PETITION WILL SERVE THE PUBLIC INTEREST

The grant of this petition will clearly serve the public interest by permitting OEConnect to fulfill the objectives of the Broadband Program and the CAF Phase II objectives of the Commission by bringing high-speed broadband to underserved locations in the Mohawk Valley Region of New York, as well as subsidized voice and broadband services to those households that qualify for Lifeline benefits. As Governor Cuomo stated when he announced that OEC had been awarded \$5,739,316 in Broadband Program Phase 3 funding:

Access to high-speed internet is critical as New York works to deliver the resources needed for industries to thrive and businesses to remain competitive in the 21st century global economy. This cutting-edge program is advancing our vision to connect communities, empower entrepreneurs and residents, and support advanced technological innovation. Projects achieved through the ... Broadband Program are a major step forward in creating the most robust broadband infrastructure network in the nation, while ensuring that reliable, high-speed internet is available to all New Yorkers.¹⁵

Granting this petition also will advance some of the same “key objectives” of the CAF Phase II program that led the Commission to conclude that the public interest would be served by waiving program rules to allow distribution of CAF support through the Broadband Program. *New York CAF Order*, 32 FCC Rcd at 974 (¶ 19). OEConnect’s participation will “promote the rapid

¹⁴ See Exhibit C (Johnson Affidavit).

¹⁵ New York January 2018 Press Release at *1.

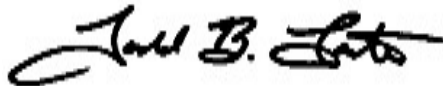
deployment of advanced services to unserved areas,” *id.*, and will aid the Commission’s objective of ensuring that federal universal service support, including CAF Phase II support, is used “efficiently and effectively.” *Id.* at 975 (¶ 20).

VI. CONCLUSION

For all of the foregoing reasons, OEConnect respectfully requests that the Commission designate it as an ETC so that OEConnect will be eligible for CAF Phase II support through the Broadband Program solely in the areas where OEC has been awarded such support.

Respectfully submitted,

OECONNECT, LLC

A handwritten signature in black ink, appearing to read "Todd B. Lantor". The signature is fluid and cursive, with the first name "Todd" and last name "Lantor" being the most prominent parts.

Todd B. Lantor
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EXHIBIT A

**LIST OF CENSUS BLOCKS IN WHICH OECONNECT SEEKS
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION STATUS**

Exhibit A

List of Census Blocks in Which OEConnect Seeks Eligible Telecommunications Carrier Designation Status

360430101001000	360775902011021	360775902023028	360775903004032
360430101001002	360775902011039	360775902023032	360775903004035
360430101001005	360775902011040	360775902023034	360775903004036
360430101001006	360775902011042	360775902023053	360775903004037
360430101001007	360775902011050	360775902023063	360775903004038
360430101001010	360775902011060	360775902023064	360775903004039
360430101001033	360775902012000	360775902023074	360775903004045
360430101001034	360775902012008	360775902023076	360775903004047
360430101001036	360775902012009	360775902023087	360775903004079
360430101001052	360775902012011	360775902023089	360775903004080
360430101001055	360775902012012	360775902023091	360775903004085
360430101001056	360775902012015	360775902023093	360775903004090
360430101001061	360775902012021	360775902023094	360775903004093
360430101001062	360775902012022	360775902023095	360775904001000
360430101001063	360775902012023	360775902023096	360775904001001
360430101001065	360775902012024	360775902023097	360775904001002
360430101001066	360775902012026	360775903001004	360775904001003
360430101001068	360775902012030	360775903001017	360775904001004
360430101001070	360775902012031	360775903001018	360775904001050
360430101001076	360775902012032	360775903001020	360775904001055
360430101001079	360775902012033	360775903001022	360775904001057
360430101002042	360775902012043	360775903001026	360775904001059
360430101002045	360775902012044	360775903001038	360775904001063
360430101002046	360775902012046	360775903001041	360775904001065
360430101002048	360775902012061	360775903001048	360775904001067
360430101002050	360775902012064	360775903001049	360775904001116
360775901001047	360775902012069	360775903001050	360775904001118
360775901001062	360775902012070	360775903001052	360775904001119
360775901001133	360775902012071	360775903001053	360775904001123
360775901001134	360775902012073	360775903001055	360775904002001
360775901001142	360775902012074	360775903001061	360775904002002
360775901002000	360775902012087	360775903001094	360775904002003
360775901002001	360775902012091	360775903001096	360775904002011
360775901002002	360775902012094	360775903001105	360775904002015
360775901002005	360775902021011	360775903003051	360775904002017
360775901002022	360775902021016	360775903003053	360775904002019
360775901002024	360775902021017	360775903003054	360775904002021
360775901002037	360775902021083	360775903003074	360775904002022
360775901002044	360775902021084	360775903004004	360775904002029
360775901003160	360775902023003	360775903004006	360775904002046
360775901004009	360775902023005	360775903004010	360775904002052
360775901004039	360775902023012	360775903004011	360775904002053
360775901004074	360775902023016	360775903004019	360775904002055
360775902011004	360775902023019	360775903004026	360775904003001
360775902011018	360775902023021	360775903004029	360775904003013
360775902011019	360775902023022	360775903004030	360775904003016
360775902011020	360775902023023	360775903004031	360775904003018

Exhibit A

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360775904003022	360775904005105	360775906002032	360775914005069
360775904003023	360775904005106	360775906002034	360775914005082
360775904003040	360775904005108	360775906002035	360775914005096
360775904004000	360775904005111	360775906002036	360775914005117
360775904004001	360775904005112	360775906002040	360775915001067
360775904004002	360775904005113	360775906002041	360775915002002
360775904004017	360775904005115	360775906002043	360775915002008
360775904004019	360775904005118	360775906002044	360775915002016
360775904004020	360775904005121	360775906002047	360775915002020
360775904004022	360775904005122	360775906002048	360775915002028
360775904004024	360775904005123	360775906002049	360775915002038
360775904004029	360775904005124	360775906002050	360775915002048
360775904004034	360775904005125	360775906002052	360775915003072
360775904004043	360775904005126	360775906002053	360775915004010
360775904004069	360775904005127	360775906002054	360775915004012
360775904004095	360775904005128	360775906002055	360775915004016
360775904004104	360775904005129	360775906002056	360775915004021
360775904004108	360775904005130	360775906002057	360775915004039
360775904005004	360775904005139	360775906002059	360775915004040
360775904005019	360775904005146	360775906002062	360775915004041
360775904005024	360775904005153	360775906002064	360775915004047
360775904005031	360775904005161	360775906002065	360775915004048
360775904005032	360775904005171	360775906002066	360775915004058
360775904005044	360775904005192	360775906002091	360775916001018
360775904005050	360775905002009	360775906002098	360775916002000
360775904005051	360775905003000	360775906002101	360775916003008
360775904005052	360775905003002	360775906002102	360775916003023
360775904005054	360775905003003	360775906002106	360775916003025
360775904005058	360775905003004	360775906002107	
360775904005059	360775905003006	360775906002110	
360775904005060	360775905003007	360775906002114	
360775904005062	360775905003020	360775906002115	
360775904005070	360775905003021	360775906002125	
360775904005071	360775905003025	360775914001008	
360775904005073	360775905003036	360775914001009	
360775904005075	360775905003039	360775914001013	
360775904005076	360775905003043	360775914001035	
360775904005077	360775905003044	360775914004030	
360775904005079	360775906001064	360775914005002	
360775904005081	360775906001065	360775914005006	
360775904005083	360775906002014	360775914005013	
360775904005086	360775906002024	360775914005016	
360775904005096	360775906002025	360775914005019	
360775904005097	360775906002026	360775914005020	
360775904005101	360775906002027	360775914005028	
360775904005102	360775906002029	360775914005037	
360775904005103	360775906002030	360775914005063	

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EXHIBIT B

**AFFIRMATIVE STATEMENT FROM THE NEW YORK PSC
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TO THE FEDERAL COMMUNICATIONS COMMISSION**



Department of Public Service

Public Service Commission

John B. Rhodes
Chair and
Chief Executive Officer

Gregg C. Sayre
Diane X. Burman
James S. Alesi
Commissioners

Thomas Congdon
Deputy Chair and
Executive Deputy

Paul Agresta
General Counsel

Kathleen H. Burgess
Secretary

Three Empire State Plaza, Albany, NY 12223-1350
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April 19, 2018

Todd B. Lantor, Counsel
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8300 Greensboro Drive – Suite 1200
Tysons, VA 22102

Re: Request for Letter Clarifying Jurisdiction over Voice over Internet Protocol
CETC Petitions/Otsego Electric Cooperative, Inc. and OEConnect, LLC.

Dear Mr. Lantor:

As you requested in your email dated March 12, 2018, enclosed is a letter providing an affirmative statement, required by the FCC, that the New York State Public Service Commission does not exercise jurisdiction over broadband and Voice over Internet Protocol providers seeking Competitive Eligible Telecommunications Carrier designation.

Sincerely,

A handwritten signature in black ink that reads "Debra LaBelle".

Debra LaBelle
Director
Office of Telecommunications

cc: Hon. Kathleen Burgess, Secretary
Ruvain Kudan, Office of Telecommunications
Graham Jesmer, Assistant Counsel



**Department of
Public Service**

Public Service Commission

John B. Rhodes
Chair and
Chief Executive Officer

Gregg C. Sayre
Diane X. Burman
James S. Alesi
Commissioners

Thomas Congdon
Deputy Chair and
Executive Deputy

Paul Agresta
General Counsel

Kathleen H. Burgess
Secretary

Three Empire State Plaza, Albany, NY 12223-1350
www.dps.ny.gov

April 19, 2018

TO WHOM IT MAY CONCERN:

**Re: Otsego Electric Cooperative, Inc. and OEConnect, LLC Voice over Internet
Protocol (VoIP) Jurisdiction**

We have received a joint request from Otsego Electric Cooperative, Inc. and OEConnect, LLC, a provider of VoIP and high-speed broadband over a fiber optic network, requesting a statement that the New York State Public Service Commission does not exercise jurisdiction over broadband and VoIP services for the purpose of making determinations regarding Competitive Eligible Telecommunications Carrier (CETC) designations under section 214(e)(6) of 47 U.S.C. At this time, the New York State Public Service Commission does not certify VoIP or broadband providers.

Consequently, based on the joint representation by Otsego Electric Cooperative, Inc. and OEConnect, LLC that it provides only VoIP and broadband services, it is not at this time subject to New York State Public Service Commission jurisdiction for the purpose of making a CETC designation.

Sincerely,

Debra LaBelle
Director
Office of Telecommunications

cc: Hon. Kathleen Burgess, Secretary
Ruvain Kudan, Office of Telecommunications
Graham Jesmer, Assistant Counsel

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
OEConnect, LLC)	WC Docket No. 09-197
)	
Petition for Eligible Telecommunications)	
Carrier Status to Receive CAF Phase II)	
Support Through the New NY Broadband)	
Program)	

EXHIBIT C
**AFFIDAVIT OF TIMOTHY R. JOHNSON
CHIEF EXECUTIVE OFFICER
OECONNECT, LLC**

AFFIDAVIT OF TIMOTHY R. JOHNSON

STATE OF NEW YORK)
) SS.
COUNTY OF OTSEGO)

Timothy R. Johnson, after being duly sworn, states the following:

1. I have personal knowledge of the facts and information set forth in this Affidavit and I am competent to testify to these facts if called as a witness.
2. I am the Chief Executive Officer of Otsego Electric Cooperative, Inc. ("OEC") and its wholly-owned direct subsidiary, OEConnect, LLC ("OEConnect"). Acting on behalf of OEC and OEConnect, I have read the Petition to which this Affidavit is attached. I have knowledge of the facts stated in the Petition and those facts are true to the best of my knowledge and my belief.
3. OEConnect certifies that it is a common carrier under §§ 214(e)(1) and 214(e)(6) of the Communications Act of 1934 ("Act").
4. OEConnect commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier in the Census Blocks described in the Petition.
5. OEConnect certifies that it will meet all of the Commission's requirements for designation as an ETC under § 214(e)(6) of the Act, as specified in paragraphs 1 through 4 of Section II.G. of the Petition.
6. I am the corporate officer responsible for certifying OEConnect's use of federal high-cost support funds. OEConnect is eligible to be designated as an Eligible Telecommunications Carrier within the meaning of Section 214(e) of the Act, and is eligible to receive universal service support pursuant to Section 254(e) of the Act.
7. OEConnect will use the federal high-cost support funds that it receives only to provide, construct, upgrade, and maintain facilities and services for which the support is intended.

8. OEConnect certifies that no party to this petition is subject to denial of federal benefits, including Commission benefits, pursuant to § 5301 of the Anti-Drug Abuse Act of 1988.



Timothy R. Johnson
Chief Executive Officer
OEConnect, LLC

County of Otsego – State of New York
The foregoing instrument was acknowledged before me
this 9th day of May, 2018, by Timothy R. Johnson.



Notary Registration Number: _____
My commission expires: _____

GODY LYNN ALLEN
Notary Public - State of New York
No. 01-AL6245566
Qualified in Otsego County
My Commission expires on 7/25/19